



**Eric Gonzalez**  
District Attorney

**DISTRICT ATTORNEY  
KINGS COUNTY**

350 JAY STREET  
BROOKLYN, NY 11201-2908  
(718) 250-2000  
WWW.BROOKLYNDA.ORG

**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME:** LAZO LLUKA

**MOS TAX:** [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

1. INEL GAILLOT V. CITY OF NEW YORK, ET AL, 8532-12, FILED IN NEW YORK COUNTY SUPREME COURT
2. GEICO/ KURT E. ECKERT V. CITY OF NEW YORK, ET AL, 039156/12, FILED IN QUEENS COUNTY SUPREME COURT
3. TINA ESPERANZA, REIGGE EDWARD, ASHA ASHARAFAN, AND LESLEY BRIGGS V. CITY OF NEW YORK, ET AL, 15-CV-02612, FILED IN THE EASTERN DISTRICT OF NEW YORK

**Disclosure # 2:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATIONS, DATED 03/25/2016, AGAINST MOS LLUKA:

ALLEGATION 1: OTHER DEPARTMENT RULES/ PROCEDURES VIOLATION

ALLEGATION 2: MEMOBOOK INCOMPLETE/ IMPROPER

ALLEGATION 3: FAIL TO NOTIFY - SUPERVISOR

ALLEGATION 4: FAIL TO SAFEGUARD - PREMISE - NOT DURING SEARCH WARRANT

CASE STATUS: CLOSED ON 08/01/2017

**Disclosure # 3:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED. 09/26/2016, AGAINST MOS LLUKA:

ALLEGATION:

1. OTHER DEPARTMENT RULES/ PROCEDURES VIOLATION

CASE STATUS: CLOSED ON 01/22/2018

ACTION TAKEN: SCHEDULE A COMMAND DISCIPLINE

**Disclosure # 4:**

ON MARCH 17, 2016, MOS LLUKA, WHILE TRANSPORTING A PRISONER IN A NYPD VEHICLE, COMMITTED THE FOLLOWING VIOLATIONS OF NYPD PATROL GUIDE PROCEDURES:

1. MOS LLUKA WRONGFULLY FAILED TO SECURE SAID PRISONER WITH A SEAT-BELT

2. MOS LLUKA WRONGFULLY FAILED TO WEAR THE PROPER UNIFORM
3. MOS LLUKA WRONGFULLY FAILED TO SECURE AND SAFEGUARD PROPERTY OF THE PRISONER, TO WIT: A UNITED STATES POST OFFICE VEHICLE AND ITS CONTENTS, IN THAT MOS LLUKA LEFT SAID PROPERTY UNSECURED AT THE LOCATION OF ARREST
4. MOS LLUKA HAVING BECOME AWARE OF AN ALLEGATION OF MISCONDUCT INVOLVING A FEDERAL EMPLOYEE, WRONGFULLY FAILED TO REPORT SAID ALLEGATION TO THE INTERNAL AFFAIRS BUREAU
5. MOS LLUKA ABUSED HIS AUTHORITY AS A MEMBER OF THE NYPD IN THAT HE STOPPED SAID PRISONER KNOWN TO THE DEPARTMENT WITHOUT SUFFICIENT LEGAL AUTHORITY
6. MOS LLUKA WAS DISCOURTEOUS TO A CIVILIAN KNOWN TO THE DEPARTMENT
7. MOS LLUKA IMPROPERLY FAILED TO TRANSMIT THE DISPOSITION OR INTERIM DISPOSITION TO THE RADIO DISPATCHER IMMEDIATELY UPON COMPLETION OF AN ASSIGNMENT AND BEFORE LEAVING THE SCENE

FOLLOWING AN IAB INVESTIGATION, MOS LLUKA ADMITTED HIS GUILT REGARDING THE ABOVE VIOLATIONS OF DEPARTMENTAL PROCEDURES, AND IN APRIL 2016, HE ACCEPTED A COMMAND "B" DISCIPLINE OF A LOSS OF 4 HOURS VACATION.

**Disclosure # 5:**

MOS LLUKA PLED GUILTY TO THE FOLLOWING NYPD DEPARTMENTAL CHARGES AND SPECIFICATIONS, DATED 04/07/2017:

1. MOS LLUKA, WHILE ON DUTY AND ASSIGNED TO THE 71ST PRECINCT, ON OR ABOUT MARCH 9, 2016, WRONGFULLY FAILED TO RENDER REASONABLE AID TO AN ADULT REQUIRING CARE DUE TO THE ARREST OF THE PERSON RESPONSIBLE FOR HER CARE.
2. MOS LLUKA, WHILE ON DUTY AND ASSIGNED TO THE 71ST PRECINCT, ON OR ABOUT MARCH 9, 2016, WRONGFULLY FAILED AND NEGLECTED TO MAKE ACTIVITY LOG ENTRIES AS REQUIRED.
3. MOS LLUKA, WHILE ON DUTY AND ASSIGNED TO THE 71ST PRECINCT, ON OR ABOUT MARCH 9, 2016, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY, OR DISCIPLINE OF THE DEPARTMENT, TO WIT; SAID POLICE OFFICER WRONGFULLY FAILED TO INFORM OR NOTIFY A SUPERVISOR THAT AN ARRESTED PERSON HAD STATED THAT HE MAY HAVE OR HAD LEFT HIS STOVE TURNED ON HIS RESIDENCE.

CASE STATUS: CLOSED ON 02/26/2020

PENALTY: FORFEITURE OF TEN (10) VACATION DAYS

**Disclosure # 6:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATIONS, DATED 7/22/2020, AGAINST MOS LLUKA: ALLEGATION:

1. FAIL TO PREPARE REPORT - OTHER REPORT

CASE STATUS: CLOSED ON 08/12/2020

ACTION TAKEN: VERBAL INSTRUCTIONS

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:**

**Disclosure # 7:**

CCRB CASE: 201602548

REPORT DATE: 03/26/2016

INCIDENT DATE: 03/17/2016

CCRB SUBSTANTIATED ALLEGATION:

1. Abuse – Stop

NYPD DISPOSITION: APU CLOSED: OTHER

Eric Gonzalez  
District Attorney  
Kings County